

# Exhibit 11

# **Expert Report**

**Of**

## **Dr. Matthew Levitt**

*Weiss v. National Westminster Bank, Plc 05 CV 4622 (DGT)(MDG)*  
*Applebaum v. National Westminster Bank, Plc 07 CV 916 (DGT)(MDG)*

As early as 1994, Hamas fundraising activities were discussed, at least in part, in the media. For example, an article in The New York Times reported:

Hamas funding of all its activities is estimated by the Israelis at about \$30 million a year. It comes from money collected by associations operating largely abroad but with ties to the international Muslim Brotherhood network. Money is also collected from Islamic and Arab communities in the United States and in Britain, the Netherlands and other Western European locations.<sup>148</sup>

Similarly, in 1996, The New York Times reported:

Israeli, Palestinian and Western intelligence officials say Jordan is a major conduit for much of the Hamas budget, estimated at \$70 million a year, nearly all of it for the social service network of mosques, hospitals, schools and other institutions that form the movement's political base in the West Bank and Gaza Strip.

...Jordan, intelligence officials say, is a major path through which money reaches the Hamas network of mosques and charities. Jordanian intelligence reports indicate that much of the money is coming from the Persian Gulf emirates and Saudi Arabia.<sup>149</sup>

## **A. THE UNION OF GOOD**

### **1. Union of Good: Origins**

The Union of Good<sup>150</sup> is an umbrella “charitable” organization that constitutes a principal fundraising mechanism for Hamas. It was established in 2000 almost immediately after the outbreak of the Second Intifada. Although it was conceived of and initially operated as a one-time fundraising campaign to support the Second Intifada – the so-called “101 Days Campaign”<sup>151</sup> – it ultimately developed into a permanent structure.<sup>152</sup> In 2001, the Union of Good created an Arabic language website for the 101 Days Campaign, launching English and French web pages soliciting donations.<sup>153</sup> Both Interpal and CBSP were subsequently designated

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<sup>148</sup> Youssef M. Ibrahim, “Brotherhood of Anger,” The New York Times, November 8, 1994.

<sup>149</sup> John Kifner, “Money is Channeled to Hamas By Way of a ‘Shocked’ Jordan,” The New York Times, March 21, 1996.

<sup>150</sup> a.k.a. 101 DAYS CAMPAIGN; a.k.a. CHARITY COALITION; a.k.a. UNION FOR GOOD; a.k.a. COALITION OF GOOD; a.k.a. ETELAF AL-KHAIR; a.k.a. ETILAFU EL-KHAIR; a.k.a. ITILAF AL-KHAIR; a.k.a. ITILAF AL-KHAYR (U.S. Department of the Treasury, “Treasury Designates Union of Good,” November 12, 2008, available at <http://www.treas.gov/press/releases/hp1267.htm>). The Union of Good’s official mailing address is P.O. Box 136301, Jeddah 21313, Saudi Arabia (U.S. Department of the Treasury, Alphabetical Listing of Specially Designated Nationals and Blocked Persons).

<sup>151</sup> The ‘101 days’ is a reference to Prime Minister Ariel Sharon’s comment that the Second Intifada would be crushed within 100 days. The premise behind the campaign was that it – and the Second Intifada – would not be extinguished in that time period (see “Fatah Responds to Sharon Government With Call for Escalation of Intifadah,” Al Ayyam covered in BBC Worldwide Monitoring, March 13, 2001).

<sup>152</sup> See, 2009 U.K. Charity Commission Report, Palestinians Relief and Development Fund (Interpal).

<sup>153</sup> These webpages appear to have been hosted by Interpal and CBSP. See 101 Days Campaign website, at <http://web.archive.org/web/20011020004111/www.interpal.org/web/campaign.htm> and <http://web.archive.org/web/20010814111826/cbsp.free.fr/101days>; CBSP, also known as Comité de Bienfaisance et de Secours aux Palestiniens (“Committee for Welfare and Aid to the Palestinians”), is Hamas’s central supporting organization in France and works in concert with Interpal

Specially Designated Global Terrorists by the U.S. Government because of their fundraising efforts on Hamas's benefit.<sup>154</sup>

The web page hosted by Interpal contains a fatwa, or Islamic religious decree, from Sheikh Yousef al-Qaradawi, who conceived of, and still leads, the Union of Good. The web page states, in part:

Dear Brothers and Sisters in Islam, the situation in Palestine is desperate. Since the start of the Al-Aqsa Intifadah [*i.e.* Second Intifada] things have taken a turn for the worse...In recognition of our Islamic duty to provide relief to the poor and needy, and in response to these urgent needs, a group of charities across the world have collaborated to form the Union of Good and launched an international appeal, the 101 Days Palestine Campaign to help ease the suffering of the poor and needy of Palestine. I as Chairman of the international Union for Good, would like to call upon all charities to participate in providing relief to the people of Palestine, upon the media to highlight the humanitarian issues affecting this campaign. I appeal to you, my brothers and sisters, to join us in this expression of solidarity with the Palestinian people.<sup>155</sup>

## 2. Union of Good: Leadership

The Union of Good was conceived of by Sheikh Yousef al-Qaradawi, an Egyptian-born Muslim Brotherhood leader. Sheikh al-Qaradawi publicly sanctioned suicide bombings against Israeli citizens through a series of "fatwas" he issued in 2001.<sup>156</sup> In fact, in September 2009, Hamas's terrorist wing posted on its website a paper on "The Concept of Jihad as the Islamic World Understand" [*sic*] in which it highlighted the work of Qaradawi. Sheikh Yousef al-Qaradawi, the paper stresses, "is extremely careful to distinguish between extremist groups that declare war on the whole world, killing indiscriminately, tainting the image of Islam and providing its enemies with fatal weapons to use against it, on the one hand, and on the other groups resisting occupation."<sup>157</sup>

Sheikh Qaradawi is the Union of Good's current leader, and serves as its chairman.<sup>158</sup> The Union of Good's leadership also includes Abd al-Rahman Siwar al-Dhahab, the former

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(*see* U.S. Department of the Treasury, "U.S. Designates Five Charities Funding Hamas and Six Senior Hamas Leaders as Terrorist Entities," August 22, 2003, available at <http://www.ustreas.gov/press/releases/js672.htm>). CBSP is discussed in greater detail *infra*. Interpal, also known as the Palestinian Relief and Development Fund, is Hamas's central supporting organization in Britain and one of the most important conduits through which money flows to Hamas from other charities. (*See* U.S. Department of the Treasury, "U.S. Designates Five Charities Funding Hamas and Six Senior Hamas Leaders as Terrorist Entities," August 22, 2003, available at <http://www.ustreas.gov/press/releases/js672.htm>). Interpal is discussed in greater detail *infra*.

<sup>154</sup> U.S. Department of the Treasury, "Treasury Designates the Union of Good," November 12, 2008, available at <http://www.treas.gov/press/releases/hp1267.htm>.

<sup>155</sup> Fatwa from Sheikh Al-Qaradawi, <http://web.archive.org/web/20011020004111/www.interpal.org/web/campaign.htm>.

<sup>156</sup> 2009 U.K. Charity Commission Report, Palestinians Relief and Development Fund (Interpal), p. 49.

<sup>157</sup> "The Concept of Jihad as the Islamic World Understand [*sic*]," September 26, 2009, posted on the Izz al Din al Qassam Bridges website, available at <http://www.qassam.ps/specialfiles.html> (accessed October 6, 2009).

<sup>158</sup> 2009 U.K. Charity Commission Report, Palestinians Relief and Development Fund (Interpal), p. 15.

President of Sudan<sup>159</sup> and until recently the Secretary General of the Union of Good. According to the U.S. Treasury Department, and as of 2007, al-Dhahab served on the Hamas executive committee under Hamas leader Khalid Mishal.<sup>160</sup> The Union of Good also has three senior Hamas members on its board of trustees: Sheikh Hamid al-Bitawi,<sup>161</sup> Dr. Essam Salhoub, and Bassam Jarrar.<sup>162</sup> They were all one time members of the Palestinian Association of Islamic Scholars.<sup>163</sup> Furthermore, Abd al-Majid al-Zindani, a Yemen-based Hamas fundraiser who was designated a Specially Designated Global Terrorist in 2004 for providing support to al-Qaida, serves on the Union of Good's board of directors. In 2006, Zindani delivered a fundraising speech at a Hamas conference in Yemen where the crowd pledged millions of riyals for Hamas.<sup>164</sup>

### 3. Union of Good: Goals

In the U.S government's designation of the Union of Good as an SDGT, it underscored that the Union of Good's overarching goal is raising funds for Hamas:

The leadership of Hamas created the Union of Good in late-2000, shortly after the start of the second Intifada, in order to facilitate the transfer of funds to Hamas. The Union of Good acts as a broker for Hamas by facilitating financial transfers between a web of charitable organizations--including several organizations previously designated under E.O. 13224 for providing support to Hamas--and Hamas-controlled organizations in the West Bank and Gaza. The primary purpose of this activity is to strengthen Hamas' political and military position in the West Bank and Gaza, including by: (i) diverting charitable donations to support Hamas members and the families of terrorist operatives; and (ii) dispensing social welfare and other charitable services on behalf of Hamas.<sup>165</sup>

Al-Qaradawi, the Union of Good's founder and chairman, has not concealed his views about the true fundamental philosophy and aim underpinning the Union of Good: aggressively combating Jews and Israelis, using any, and all, means possible. For example, the U.K. Charity Commission report issued in 2009 examining Union of Good "member" Interpal quoted Sheikh Qaradawi as follows:

I became more preoccupied and interested in [the Palestinian issue] when I became mature and more aware of life, and that is for many reasons. Because the

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<sup>159</sup> C.S.S. Special Information Bulletin, "The Union of Good," February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

<sup>160</sup> U.S. Department of the Treasury, "Treasury Designates the Union of Good," November 12, 2008, available at <http://www.treas.gov/press/releases/hp1267.htm>.

<sup>161</sup> Sheikh al-Bitawi was a HAMAS representative in the Palestinian parliament in 2006 (see "'Tens of Thousands of Palestinians Said to Protest 'International Extortion,'" BBC Monitoring Middle East, May 5, 2006).

<sup>162</sup> C.S.S. Special Information Bulletin, "The Union of Good," February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

<sup>163</sup> *Id.*

<sup>164</sup> U.S. Department of the Treasury, "Treasury Designates the Union of Good," November 12, 2008, available at <http://www.treas.gov/press/releases/hp1267.htm>.

<sup>165</sup> *Id.*

issue is concerned with a part of the Islamic lands and we have been taught in [school] that when any part of the Islamic land is invaded by any invader, it will be an individual duty on all its people to resist the invader, each as far as he could, male or female, and that all Muslims across the world have to aid them with all that is needed, be it weapons, money or men.<sup>166</sup>

Al-Qaradawi's reference to "weapons, money or men" was not accidental. On the contrary, Sheikh al-Qaradawi has been consistently outspoken in the varied ways that support can be provided to Hamas, underscoring that assistance can be provided through suicide bombings against Israeli targets<sup>167</sup> as well as by providing financial support. For example, in 2001, al-Qaradawi described the activities of the Islamic Hamas-related "charitable" societies sustaining the Second Intifada as "a new type of jihad, financial jihad, through which financial support is guaranteed to the martyrs' families, Palestinian prisoners and detainees, and every prisoner whose property is damaged during the conflict."<sup>168</sup> In a 2006 sworn declaration submitted to a federal court in New York, al-Qawadari stated "[M]y attitude toward 'suicide bombing' in Israel, where the Palestinians have been invaded and oppressed, is different. I support such actions as a people's defense of their homeland."<sup>169</sup> As is apparent in the 2009 U.K. Charity Commission Report, Al-Qaradawi has played a personal role in supporting both Hamas and its violent activities.<sup>170</sup> In fact, at one public event, Hamas leader Khalid Mishal publicly thanked him for his assistance.<sup>171</sup>

#### **4. Union of Good: Key Member Organizations**

Three key member organizations forming the Union of Good's core are CBSP, Interpal and the Al-Aqsa Foundation, each of which is discussed in detail below. These organizations had all been individually raising funds for Hamas prior to 2000 when the Union of Good came into existence and instituted an umbrella-like fundraising system.<sup>172</sup>

However, these three organizations are not the only members of the Union of Good. Other notable member organizations under the Union of Good's "umbrella" include the Palestinian Association in Austria (PVOE)<sup>173</sup>, the Sanabil Association for Relief and Development in Lebanon (now closed), and the Association de Secours Palestinien – Switzerland (ASP), each of which was also designated as a Hamas-affiliated terrorist by the U.S.

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<sup>166</sup> 2009 U.K. Charity Commission Report, Palestinians Relief and Development Fund (Interpal), p.16

<sup>167</sup> "Al-Jazeera Programme Debates Arab Stand on Intifadah, Suicide Bombers," BBC Worldwide Monitoring, April 30, 2002.

<sup>168</sup> Lt. Col. Jonathan D. Halevi, "What Drives Saudi Arabia to Persist in Terrorist Financing? Al-Jihad bi-al-Mal - Financial Jihad Against the Infidels," Jerusalem Viewpoints no. 531, 1 June 2005.

<sup>169</sup> Declaration of Sheikh Yusuf Al-Qawadari in Support of His Motion to Dismiss the Complaints, In re Terrorist Attacks on September 11, 2001 (S.D.N.Y.), 1:03-md-01570-GBD-FM (July 30, 2006). Document number 1878.

<sup>170</sup> 2009 U.K. Charity Commission Report, Palestinians Relief and Development Fund (Interpal).

<sup>171</sup> "Hamas Leader Khaled Mash'al Praises Sheikh Yousef Al-Qaradawi for His Support of Suicide Operations and States: Holocaust Exaggerated, Being Used to Extort Germany, and Zionist Holocaust against Arabs Much Worse," The Middle East Media Research Institute, August 2, 2007, available at <http://www.memri.org/bin/articles.cgi?Page=countries&Area=palestinian&ID=SP167207>.

<sup>172</sup> C.S.S. Special Information Bulletin, "The Union of Good," February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

<sup>173</sup> As set forth in Exhibit A and Exhibit B of the Supplemental Geisser Report, between 1997 and 2001, Interpal, through its accounts with NatWest, engaged in 7 transactions with the PVOE, in which the PVOE sent Interpal the equivalent of \$28,450.

NatWest accounts, including transactions with Sanabil, WAMY, PVOE, and various Al Aqsa Foundation entities are detailed in the Supplemental Geisser Report and are referenced in this Report.

## 5. Transfers from Interpal to Hamas-Controlled Entities<sup>213</sup>

Like CBSP, Interpal transferred funds both to Hamas affiliated organizations in the Palestinian Territories and to organizations outside the Territories.

Significantly, Interpal transferred funds to numerous Hamas-affiliated or controlled organizations, including:

- *Al Mujama al-Islami* (Islamic Center, Gaza)
- *Al-Jam'iya al-Islamiya* (Islamic Society or Islamic Association, Gaza)
- *Al Salah* in Gaza
- Zakat Fund Committee-Jenin
- Ramallah Zakat Committee
- Tulkarm Zakat Committee
- El-Wafa Rehabilitation & Health Center (Al Wafa Charitable Society)
- Islamic Charitable Society - Hebron
- Al-Tadamon Charitable Society
- Al-Islah Charitable Society<sup>214</sup>
- Beit Fajar Zakat Committee

Interpal's ties with Hamas front organizations in the West Bank, Gaza, and Israel proper (discussed later in this report) have been established through telephone transcripts introduced in the Israeli criminal prosecution in June 2003<sup>215</sup> of Sheikh Raed Salah, an Israeli-Arab leader convicted of funneling money to Hamas.<sup>216</sup> The transcripts revealed that Sheikh Salah communicated extensively with Interpal officials while laundering and funneling money received from Interpal to Hamas-controlled institutions in the West Bank and Gaza Strip.<sup>217</sup>

Moreover, Interpal has, historically, not concealed its connections to some of the most well-known Hamas front organizations. Its October 2002 newsletter lists Interpal's funding of *Al Salah* Charitable Association (designated as a terrorist entity by the U.S. and Israel), for

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the New York donor would in fact get to Hamas. Al-Moayad traveled from Yemen to Germany in furtherance of the conspiracy, and knew that the money was to travel from Brooklyn, New York to places outside the United States.

<sup>213</sup> For the following information, see Expert Report of Wayne D. Geisser, CPA, CVA, CFE, Nihill & Riedley, PC, November 19, 2009.

<sup>214</sup> Interpal transferred \$33,800 to the Al-Islah Charitable Society in Ramallah. Among the documents seized from the charity's office was a receipt dated January 15, 2001 for that donation, printed on Interpal stationary and signed by Jamal Mohammad Tawil, a senior Hamas operative and founder of the charity. Tawil was involved in planning several suicide attacks, including the car bomb attack in Jerusalem's Ben Yehuda pedestrian mall in December 2001 that killed 12 people and wounded 180 others. See C.S.S. Special Information Bulletin, Interpal, Part I; see also C.S.S. Special Information Bulletin, Israeli Security Forces Seize Palestinian Terrorist Assets Held in Banks Across the West Bank, December 2004, [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC12A\\_04.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC12A_04.PDF)

<sup>215</sup> Greg Myre, "Israel Ties 5 Citizens to Funding for Hamas," *The New York Times*, June 25, 2003.

<sup>216</sup> Gideon Maron and Yuval Karni, "The Secret Intercepts of Shaykh Salah," *Yediot Ahronot*, August 29, 2003 (Hebrew).

<sup>217</sup> *Id.*

## F. MUSLIM HANDS

Muslim Hands was founded in November 1993 under the working name “United for the Needy” and changed its name to Muslim Hands in 2004. It is an original member of the Union of Good’s 101 Days Campaign.<sup>336</sup> According to its website, the organization operates in 40 countries, with field offices in 20, and donates in excess of £7,000,000 annually.<sup>337</sup> Muslim Hands is an affiliate of the Muslim Council of Britain, a U.K. group heavily influenced by Muslim Brotherhood organizations.<sup>338</sup>

It has operated in Gaza since 1994 and in 2007 opened a new office in Gaza City. According to its website, Muslim Hands’ Gaza operations have included “providing orphan sponsorship, agricultural projects, support for widows and income generation schemes.”<sup>339</sup> Muslim Hands was one of five U.K. Union of Good charities banned by Israel in 2008 for ties with Hamas.<sup>340</sup> Muslim Hands annual records show that the organization has made donations to several Hamas-affiliated organizations. These include Al Lod Charitable Society – Palestine, Jerusalem Zakat Committee, Islamic Charitable Organization – Palestine, Al Zakat Committee – Palestine, Islamic University Gaza, and Hebron Zakat Committee.<sup>341</sup>

## VI. ENTITIES THAT RECEIVED FUNDING FROM CBSP THROUGH CRÉDIT LYONNAIS, S.A. AND FROM NATWEST THROUGH INTERPAL AND OTHER UNION OF GOOD AFFILIATES

### A. Islamic Center Gaza (*Al-Mujama al-Islami*)

The Islamic Center Gaza or the Islamic Complex Gaza, otherwise known as *al-Mujama al-Islami*, is one of the oldest and most important charities comprising Hamas’s *da’wa* wing.<sup>342</sup> It was formally designated by Israel as an unlawful organization affiliated with Hamas in February 2002 and by the Palestinian Authority on August 24, 2003<sup>343</sup>, but its status as Hamas’s central

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<sup>336</sup> *Id.* at p. 35.

<sup>337</sup> “Muslim Hands: Our History,” available online at [http://www.muslimhands.org/en/gb/about\\_mh/our\\_history/#y1994](http://www.muslimhands.org/en/gb/about_mh/our_history/#y1994).

<sup>338</sup> Michael Whine, “The Advance of the Muslim Brotherhood in the UK” Current Trends in Islamist Ideology, 2 (September 2005), available at <http://www.currenttrends.org/research/detail/the-advance-of-the-muslim-brotherhood-in-the-uk>.

<sup>339</sup> “Muslim Hands: Our History,” available online at [http://www.muslimhands.org/en/gb/about\\_mh/our\\_history/#y1994](http://www.muslimhands.org/en/gb/about_mh/our_history/#y1994).

<sup>340</sup> Israel Ministry of Foreign Affairs, “Defense Minister signs order banning Hamas-affiliated charitable organizations,” July 7, 2008.

<sup>341</sup> Steve Merley, “The Union of Good: INTERPAL and the U.K. Member Organizations,” March 23, 2009, The NEFA Foundation, available at <http://www.nefafoundation.org/miscellaneous/FeaturedDocs/nefaunionofgoodmemberorgs0309.pdf>, p.39

<sup>342</sup> Jimmy Gurule, Unfunding Terror: The Legal Response to the Financing of Global Terrorism (Edward Elgar Publishing, Inc: Massachusetts), 2008, p. 133.

<sup>343</sup> A March 4, 2004 report by the German Intelligence Service - BND (Federal Office for the Protection of the Constitution) noted the Palestinian Authority evinced a pattern prior to 2003 of targeting individual branches of Hamas zakat committees while failing to designate the larger umbrella organizations. “All individual clubs and branch associations affected by the prohibition decree by the Palestinian Authority in the winter of 2001/2 and August of 2003 are located on the West Bank. All individual associations and branch associations affected by the account freeze in August of 2003 are located in the Gaza Strip. In that regard, true “duplicate bans” between then and now cannot be observed.” The BND noted that the August 24, 2003 action by the PA against inter alia, al-Mujama al-Islami, Jamiya al-Islamiya and al Salah was explicitly justified for the purpose of “stopping support for HAMAS organizations.” (See Letter from the Federal Ministry of the Interior, Germany, to the Federal Chancellery of Germany, March 4, 2004, certified translation from the German language, provided by Plaintiffs, marked page W\_S094982.)



institution has been widely and publicly recognized since the early 1990s.<sup>344</sup> In the 1970s, *al-Mujama* focused on building new mosques to establish a power base for the Muslim Brotherhood outside the traditional channels of the Islamic religious authorities in Gaza. In the late 1970s and early 1980s, it turned its attention to a Muslim Brotherhood take-over of the Islamic University of Gaza which further extended its influence in the Gaza Strip.<sup>345</sup>

According to a document produced by the group and written by its leadership, “Al-Mojama’a al-islami was established in 1978, and initially started its activities as a mosque. It afterward developed to practice religious appeals and educational, cultural and sport activities.”<sup>346</sup> Sheikh Yassin, a founder of Hamas and its spiritual leader until his death, founded *al-Mujama*, which he originally developed as an umbrella organization for several religious charities and groups in the Gaza Strip.<sup>347</sup> Like its sister organization, *al-Jamiya al-Islamiya*, the Muslim Brotherhood initially used *al-Mujama* as a recruitment tool to expand its support base geographically and to increase its membership.<sup>348</sup>

*Al-Mujama* described itself as, “...the spark since the faithful young men started working and at [t]he same time holding the everlasting motto: (ISLAM is the SOLUTION).”<sup>349</sup> It depicted its aims as, “looking after the new Muslim Generation and taking care of its behavioral and religious side by the program of learning chapters of the Holy Quran by heart...Teaching the martyrs, jailed, needy sons free of charge trying to make up for them.”<sup>350</sup> Members of the group further wrote, “we hope these students can make the generation of liberation of Al-Aqsa and Palestine and we, moreover, hope we can find those good people who can help and give a hand so that we can achieve our supreme aims.”<sup>351</sup>

## 1. Ties to Hamas

According to Palestinian scholar Ziad Abu-Amr, *al-Mujama* was originally characterized as “a front organization for the Muslim Brotherhood in Gaza.”<sup>352</sup>

According to Anat Kurz and Nahman Tal of the Project on Terrorism at the Jaffee Center for Strategic Studies, by 1987, *al-Mujama* controlled an estimated forty percent of all mosques in

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<sup>344</sup> Ziad Abu-Amr, *Islamic Fundamentalism in the West Bank and Gaza*, (1994), p. 16.

<sup>345</sup> See, Shaul Mishal & Avraham Sela, *The Palestinian Hamas*, Columbia University Press, 2000, pp. 23-24. See also, Ziad Abu-Amr, “Sheikh Ahmed Yassin and the Origins of Hamas” in *Spokesmen for the Despised: Fundamentalist Leaders of the Middle East*, University of Chicago Press, 1997, p. 234 (“Employing his unique talents and circumstance with great dexterity, Yassin extended the Brotherhoods control over the Islamic University and the waqf (religious endowment) authority in Gaza. The Islamic University, founded in 1978, was the only university in Gaza and quickly became the Muslim Brotherhood’s principal stronghold.”).

<sup>346</sup> *U.S. v. HLF, et al.*, GX Search-105, “A Summary about: Al-Mojama’a al-Islami & Al-Aqsa M. Schools & Kindergartens.”

<sup>347</sup> Ravi Nessman, “Sheikh Ahmed Yassin, Founder of Radical Hamas Group, Is Killed in Israeli Airstrike,” *Associated Press*, March 22, 2004. Yassin confirmed his own role in the *Mujama* in an interview with Abu-Amr. P. 140, note 43.

<sup>348</sup> J. Millard Burr and Robert O. Collins, *Alms for Jihad: Charity and Terrorism in the Islamic World*, Cambridge University Press (2006), p. 233.

<sup>349</sup> *U.S. v. HLF, et al.*, 3:04-CR-240-G, GX Search-105, “A Summary about: Al-Mojama’a al-Islami & Al-Aqsa M. Schools & Kindergartens.”

<sup>350</sup> *Id.*

<sup>351</sup> *Id.*

<sup>352</sup> Abu-Amr, *Islamic Fundamentalism in the West Bank and Gaza*, pp. 16-17, 63.

the Gaza Strip.<sup>353</sup> By providing basic social and religious services in the Gaza Strip, it continued to grow. At the start of the First Intifada in 1987, Sheikh Yassin and several other members of *al-Mujama* launched Hamas, using *al-Mujama*'s base to do so.<sup>354</sup>

Moin Shubib noted the significance of *al-Mujama* in a 1993 meeting that was attended by several subsequently convicted Hamas fundraisers. In assessing Hamas's institutions in the Gaza Strip, he stated, in part:

If we speak in general terms about our organizations in the [Gaza] Sector, they are limited and I will try to mention them quickly...the Islamic Complex which was founded in 1973 and licensed in 1976. The Complex' activities at that time was more inclusive.<sup>355</sup>

## 2. Shared Leadership<sup>356</sup>

As noted above, Sheik Yassin and Abdel Aziz al-Rantisi were co-founders of both *al-Mujama* and Hamas.<sup>357</sup> According to Palestinian scholar Ziad Abu-Amr, Mahmoud al-Zahar and Ibrahim al-Yazuri were additional members of *al-Mujama* that helped found Hamas.<sup>358</sup>

## 3. Hamas-related Activities

According to the International Crisis Group, the affiliation of the extensive network of institutions that comprise *al-Mujama* with Hamas is "readily apparent" and "all but official."<sup>359</sup> This is best demonstrated by *al-Mujama*'s relationships with known Hamas charities.

According to wire transfers made public in the HLF trial, in 1989, the Occupied Land Fund (HLF's predecessor) transferred approximately 640,245 USD to *al-Mujama*.<sup>360</sup> Additionally, HLF, a designated entity since December 4, 2001, transferred approximately \$8,500 worth of funds to *al-Mujama*.<sup>361</sup> According to the U.S. Department of Treasury, "Holy Land supports HAMAS activities through direct fund transfers to its offices in the West Bank and Gaza that are affiliated with HAMAS and transfers of funds to Islamic charity committees ("zakat committees") and other charitable organizations that are part of HAMAS or controlled by HAMAS members."<sup>362</sup> *Al-Mujama* has received significant funding from HLF over the years. In

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<sup>353</sup> Meir Hatina, *Islam and Salvation in Palestine*, p. 19; Anat Kurz wit Nahman Tal, "Hamas: Radical Islam in a National Struggle," *Jaffee Center for Strategic Studies, Memorandum No. 48* (Tel Aviv University, July 1997), p. 12.

<sup>354</sup> Andrew Higgins, "How Israel Helped to Spawn Hamas," *The Wall Street Journal*, January 24, 2009.

<sup>355</sup> Transcript of Dr. Moin Shubib, Philadelphia meeting, *U.S. v. HLF et al.*, 3:04-CR-240-G, GX 016-0059.

<sup>356</sup> Even Khaled Hroub who has served as a defense expert in the trial of Mohammed Salah and who has taken issue with the use of the term "terrorist" to describe Hamas suicide bombers, wrote in his book, *Hamas: Political Thought and Practice*, Institute for Palestine Studies, 2000, that "It is worth emphasizing here that the leaders of the Brotherhood became the leaders of Hamas when it emerged in late 1987." At p. 35.

<sup>357</sup> Ravi Nessman, "Sheikh Ahmed Yassin, Founder of Radical Hamas Group, Is Killed in Israeli Airstrike," *Associated Press*, March 22, 2004.

<sup>358</sup> Abu-Amr, *Islamic Fundamentalism in the West Bank and Gaza*, pp. 16-17, 63. See also Meir Hatina, *Islam and Salvation in Palestine*, p. 19.

<sup>359</sup> "Islamic Social Welfare Activism in the Occupied Palestinian Territories: A Legitimate Target?", ICG Report April 2003.

<sup>360</sup> Islamic Center of Gaza wire and check transfers, *US vs. HLF, et al.*, 3:04-CR-240-G, GX 020-0019.

<sup>361</sup> *Id.*

<sup>362</sup> U.S. Department of Treasury, "Shutting Down the Terrorist Financial Network December 4, 2001," December 4, 2001.

1994, according to correspondence made public by the HLF trial, *al-Mujama* received funding from HLF for its summer camp.<sup>363</sup>

*Al-Mujama* received funds from CBSP, Interpal and The Al-Aqsa Foundation.<sup>364</sup> In 2002, Crédit Lyonnais transferred the equivalent of over \$10,000 on behalf of CBSP to *al-Mujama*.<sup>365</sup> Between 1996 and 2005, Interpal transferred the equivalent of over \$1,500,000 to *al-Mujama*.<sup>366</sup>

### **B. Islamic Society Gaza (*Al-Jam'iya al-Islamiya*)**

The Islamic Society Gaza or Islamic Association Gaza, otherwise known as *al-Jam'iya al-Islamiya*, is one of the largest and earliest charitable organizations to become a component of Hamas's *da'wa*.<sup>367</sup> According to Hamas's own semi-official history, from the years 1976 to 1981, Hamas used *al-Jam'iya* as a tool to expand its base, geographically and member-wise.<sup>368</sup> According to Palestinian author Zaki Chehab, once Israel took control of Gaza in 1967, the Muslim Brotherhood increased its activity in Gaza by founding charitable societies, and schools, which were mostly mosque-affiliated religious schools and kindergartens. Chehab states: "These activities became more widespread in 1973 when the Muslim Brotherhood, or other Islamist groups sympathetic to them, set up Islamic Societies in Gaza, Hebron, Nablus, and Jerusalem. Following the ideas and teachings of the Brotherhood, Sheikh Yassin had set up an Islamic Society in 1976."<sup>369</sup>

The link between *al-Jam'iya* and Hamas has never been seriously disputed; in fact, it has been the subject of numerous reputable news reports by Western and English-language media since the early 1990s.<sup>370</sup> Under pressure from the Israeli government following a string of terrorist attacks, the Palestinian Authority arrested various leaders and members of *al-Jam'iya* in 1998, including its chairman, Dr. Ahmad Bahar, discussed *supra*. The pattern was repeated in December 2001, when the Palestinian Authority launched a large-scale operation against Hamas

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<sup>363</sup> *US vs. HLF, et al.*, 3:04-CR-240-G, GX HL420000372.

<sup>364</sup> For Al-Aqsa, see Audit report of Al-Aqsa e.V., Enclosure 1, provided by Plaintiffs, marked page W\_S092500.

<sup>365</sup> Expert Report of Wayne D. Geisser, CPA, CVA, CFE, Nihill & Riedley, PC, November 19, 2009.

<sup>366</sup> *Id.*

<sup>367</sup> "Palestinian Authority Closes Down Islamic Institutions, Societies, Newspapers," BBC Monitoring International Reports, January 1, 2002

<sup>368</sup> Hamas document "al-Haqiqa wal-Wujud" [Truth and Existence] (a semiofficial history of Hamas), 1990, Part 1, p. 34, as cited in Shaul Mishal and Avraham Sela, *Palestinian Hamas: Vision, Violence, and Coexistence*, New York: Columbia University Press, 2000, p. 18.. Al-Jam'iya Al-Islamiya's affiliation with Hamas was also confirmed by Muin Shubib, a Hamas operative, who furnished a list of Hamas-affiliated charities in the West Bank and Gaza when he spoke at a Hamas meeting in Philadelphia, PA in 1993. On his list, the Islamic Society of Gaza is identified as a Hamas charity. (See transcript of Dr. Moin Shubib, Philadelphia meeting, *U.S. v. HLF et al.*, 3:04-CR-240-G, GX 016-0059.)

<sup>369</sup> Zaki Chehab, *Inside Hamas: The Untold Story of the Militant Islamic Movement* (New York: Nation Books, 2007) p. 19.

<sup>370</sup> In fact, the *Financial Times*, in a September 9, 1988 article, referred to PLO claims that Israel was in collusion with Hamas by stating "To substantiate their suspicions, Palestinians point to the surprising failure of the Israeli authorities to arrest and deport Sheikh Ahmed Yassin, the crippled spiritual leader of the Islamic Association in the Gaza Strip." The connection between Hamas and the Islamic Society was also explicitly referenced in numerous publications in the 1990, see, e.g. *The Independent*, August 22, 1993 ("The Gaza school, the Light of Islam kindergarten, is run by the Islamic Society which is controlled by Hamas, the militant Islamic movement.") *Sunday Times (of London)* September 5, 1993 ("... In the cool, whitewashed offices of the Islamic Society, Abu Al-Abed warns that Arafat too will face the righteous wrath of Hamas if he fails to govern according to the strictest laws of God ...")

and Palestinian Islamic Jihad (PIJ)<sup>371</sup> affiliated organizations and societies; that operation temporarily restricted *al-Jam'iya*'s activities in Gaza.<sup>372</sup> The Israeli government outlawed *al-Jam'iya* in February 2002 because of its affiliation with Hamas.<sup>373</sup> In August 2003, the Palestinian Authority formally designated *al-Jam'iya* an illegal Hamas organization and froze its bank accounts (it rescinded the order in November 2003 as part of an effort at reconciliation with Hamas).<sup>374</sup>

The fact that *al-Jam'iya* was originally established by Hamas founder Sheikh Yassin when he was building Hamas's infrastructure in the West Bank and Gaza, underscores *al-Jam'iya*'s significance within Hamas. During the 1970s and 1980s, according to its own semi-official history, Hamas was progressing from its first phase of creating a "hard core" assembly of Muslim Brotherhood adherents in the Gaza Strip to its second phase of institution-building, which included *al-Jam'iya*'s founding. These were the first two steps in a multi-phase program that resulted in the formation of Hamas as the Palestinian Muslim Brotherhood's militant arm, and the launching of continuing jihad.<sup>375</sup>

### 1. Shared Leadership

Several individuals were centrally involved in both *al-Jam'iya* and Hamas, including Sheikh Yassin, who was involved in founding both;<sup>376</sup> Abu Shanab, who stated - "I founded Jam'iya al-Islamiyah, but I cut my connection with them when Hamas was first established" in December 1987<sup>377</sup>; Ahmad Bahar - whose connections to both Hamas and *al-Jam'iya* were a matter of public record in the mid-1990s<sup>378</sup>; and Ibrahim al-Yazuri.<sup>379</sup>

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<sup>371</sup> Palestinian Islamic Jihad is a Foreign Terrorist Organization with close ties to Iran (see U.S. Department of State, Foreign Terrorist Organizations, July 7, 2009, available at <http://www.state.gov/s/ct/rls/other/des/123085.htm> and Kenneth Katzman, "Iran: U.S. Concerns and Policy Responses," Congressional Research Service, October 8, 2008).

<sup>372</sup> "Palestinian Authority Closes Down Islamic Institutions, Societies, Newspapers," BBC Monitoring International Reports, January 1, 2002. As stated by Hamas political leader Ismail Abu Shanab, a founder of Al-Jam'iya Al-Islamiya, "...even before Hamas came into being, in 1976, there were two organizations that were engaged in the social welfare: Al-Jam'iya Al-Islamiyaya and al-Mujama." See, Jessica Stern, Terror in the Name of God: Why Religious Militants Kill, (New York, N.Y.: Harper Collins Publishers), August, 2003, p. 41.

<sup>373</sup> C.S.S. Special Information Bulletin, "List of Entities Declares 'Unlawful Organizations' In Israel by order of Israeli Prime Minister, according to Israeli Emergency Defense Regulations (article 82 2 A) 1945 Due to their Connection to Hamas," available at [http://www.terrorism-info.org.il/malam\\_multimedia/html/final/eng/c\\_t/ipm\\_2\\_04.htm](http://www.terrorism-info.org.il/malam_multimedia/html/final/eng/c_t/ipm_2_04.htm).

<sup>374</sup> Letter from the Federal Ministry of the Interior, Germany, to the Federal Chancellery of Germany, March 4, 2004, certified translation from the German language, provided by Plaintiffs, marked pages W\_S094977 - W\_S094991.

<sup>375</sup> Hamas document "al-Haqiqa wal-Wujud" [Truth and Existence] (a semiofficial history of Hamas), 1990, part I, p. 34, as cited in Shaul Mishal and Avraham Sela, Palestinian Hamas: Vision, Violence, and Coexistence (New York: Columbia University Press, 2000) p. 18.

<sup>376</sup> Khaled Abu Toameh, "The Sheikh's Progress," The Jerusalem Report, July 20, 1998.

<sup>377</sup> Jessica Stern, Terror in the Name of God: Why Religious Militants Kill, (New York, N.Y.: Harper Collins Publishers), August, 2003, p. 41.

<sup>378</sup> Jon Emmanuel, "Arafat: Hamas Using Gaza as Launching Pad," The Jerusalem Post, April 9, 1995.

<sup>379</sup> "AFP Reports Support in Gaza for Fatah-Hamas Code of Honour," BBC Summary of World Broadcasts, Agence France Presse, September 20, 2003.

## 2. Indoctrination

A particularly disturbing example of indoctrination activity at *al-Jam'iya* is reflected in a video of a graduation ceremony held for 1,650 children from its forty-one kindergartens.<sup>380</sup> According to a widely distributed video and photographs of the event, the children were dressed in uniforms and given mock rifles to carry, and swore an oath “to pursue jihad, resistance, and Intifada.” One girl had her hands dipped in red paint mimicking the bloodied hands proudly displayed by several Palestinians after lynching two Israeli army reservists who had become lost near Ramallah. A pair of children were dressed as Sheikh Yassin and Hezbollah’s Sheikh Hassan Nasrallah, and others wore the costume of suicide bombers. Children read excerpts of Nasrallah’s recent speeches, and their friends waved Hezbollah flags.<sup>381</sup> As in the case of the Islamic Charitable Association, *al-Jam'iya* goes to great lengths to instill Hamas’ values in Palestinian children.

Sheikh Ahmad Bahar oversaw summer camps Hamas hosted in July 2003 called “The al-Aqsa Intifada Martyrs Summer Camps.”<sup>382</sup> They combined recreation with indoctrination, both active, in the form of classes on radical Islam, and passive, in the form of pervasive images of suicide bombers plastered on walls throughout the camp. Some of these camps serve to indoctrinate children, while others reportedly provide actual small arms training.<sup>383</sup> The camps are financed through donations from *da'wa* charities, and pay for items that are luxuries for its campers, such as new uniforms, shoes, and books. These are a powerful inducement for children to attend the camps, and often succeed in drawing children from both religious and secular families.<sup>384</sup>

Both the graduation ceremony and summer camps confirm that Hamas is actively seeking to indoctrinate children. The benefits to a terrorist group include building membership and support. According to ISA, “the innocent appearance of children and young people arouses less suspicion and enables them to more easily blend in crowded places. Moreover, children and teenagers are seen by the terrorist organizations as more easily influenced and constitute an easier recruitment base for suicide attacks.”<sup>385</sup> According to Sheikh Bahar, teaching children the history of Islam while they are surrounded by pictures of martyrs instills “seeds of hate against Israel.”<sup>386</sup>

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<sup>380</sup> Hamas kindergarten video, *U.S. v. HLF et al.*, GX 6-59.

<sup>381</sup> *Id.*

<sup>382</sup> Israeli Ministry of Foreign Affairs, “Participation of Children and Teenagers in Terrorist Activity During the Al-Aqsa Intifada,” MFA Library, January 2003, available at <http://www.mfa.gov.il/mfa/go.asp?MFAH0n100>.

<sup>383</sup> Israeli Ministry of Foreign Affairs, “The Exploitation of Children for Terrorist Purposes—Jan 2003,” MFA Library, January 2003, January 15, 2003, available at [http://www.mfa.gov.il/mfa/mfaarchive/2000\\_2009/2003/1/the+exploitation+of+children+for+terrorist+purpose.htm](http://www.mfa.gov.il/mfa/mfaarchive/2000_2009/2003/1/the+exploitation+of+children+for+terrorist+purpose.htm).

<sup>384</sup> Israeli Ministry of Foreign Affairs, “Participation of Children and Teenagers in Terrorist Activity During the Al-Aqsa Intifada,” MFA Library, January 2003, available at <http://www.mfa.gov.il/mfa/go.asp?MFAH0n100>.

<sup>385</sup> Israeli Security Agency, “2004 Terrorism Data.” GSS Announcements, Prime Minister’s Office, Government of Israel, January 4, 2005, available at <http://www.pmo.gov/PMOENG/communication/spokesman/GSS/GSS060105.htm>.

<sup>386</sup> Israeli Ministry of Foreign Affairs, “Participation of Children and Teenagers in Terrorist Activity During the Al-Aqsa Intifada,” MFA Library, January 2003, available at <http://www.mfa.gov.il/mfa/go.asp?MFAH0n100>.

Netanya, during which 5 Israelis were killed and 74 injured.<sup>390</sup>

*Al-Jam'iya* received funds from CBSP, Interpal and The Al-Aqsa Foundation.<sup>391</sup> Between 1997 and 2002, Crédit Lyonnais transferred the equivalent of over \$179,000 on behalf of CBSP to *al-Jam'iya*.<sup>392</sup> Between 1996 and 2005, Interpal transferred the equivalent of over \$2,600,000 to *al-Jam'iya*.<sup>393</sup>

### C. *Al Salah Society*

*Al Salah Society*, or *Jamiyat al-Salah*, is a key part of Hamas's charitable network. According to Abu Shanab, a senior Gaza-based Hamas founder and leader, the *al Salah Society* is "one of the three charities that form Hamas' welfare arm."<sup>394</sup> The United States designated *al Salah* a Specially Designated Global Terrorist on August 7, 2007.<sup>395</sup> According to Adam Szubin, Director of the Treasury Department's Office of Foreign Assets Control (OFAC), "Hamas has used the Al-Salah Society, as it has other charitable fronts, to finance its terrorist agenda." The U.S. Treasury Department designation of *al Salah Society* stated, "Al Salah supported Hamas affiliated combatants during the first Intifada and recruited and indoctrinated youth to support Hamas' activities. It also financed commercial stores, kindergartens and the purchase of land for Hamas."<sup>396</sup>

The link between *al Salah* and Hamas – which has never been seriously disputed – has been the subject of numerous reputable news reports by Western and English-language media.<sup>397</sup> According to a 2003 report by the International Crisis Group, "The Al-Salah Islamic Association, considered one of the largest Hamas-affiliated organisations in the Gaza Strip, obtains support from a variety of local and foreign organizations on the basis of project proposals it submits."<sup>398</sup> According to a 2001 article in *The New York Times*, the Al Salah Society has received funding from Saudi Arabia. The article states, "money is then wired to a Gaza branch of the private, Palestinian-owned Arab Bank: \$5,000 for spouses or parents of those killed, \$2,500 for the wounded. The Salah Association, which denies reports that it is associated with Hamas, says it has also distributed 200,000 Saudi-financed food baskets in the last two months."<sup>399</sup>

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<sup>390</sup> *Id.*

<sup>391</sup> For Al-Aqsa Foundation, see Letter dated November 28, 2002, from the German Intelligence Service (BND) to the German Ministry of the Interior in Berlin, Subject: Proscription Proceedings Al-Aqsa e. V Aachen, provided by Plaintiffs, marked pages W\_S092791-W\_S092795.

<sup>392</sup> Expert Report of Wayne D. Geisser, CPA, CVA, CFE, Nihill & Riedley, PC, November 19, 2009.

<sup>393</sup> *Id.*

<sup>394</sup> U.S. Department of Treasury, "Treasury Designates Al-Salah Society Key Support Node for Hamas," August 7, 2007, available at <http://www.treas.gov/press/releases/hp531.htm>.

<sup>395</sup> *Id.*

<sup>396</sup> *Id.*

<sup>397</sup> See, e.g. *The Independent*, December 7, 2001 (describing Al-Salah as "an offshoot of Hamas").

<sup>398</sup> ICG email interview with al-Salah Islamic association, February 25, 2003. See ICG Report, Islamic Social Welfare Activism in the Occupied Palestinian Territories: A Legitimate Target?, April 2003.

<sup>399</sup> William A. Orme, Jr. "Gulf Arab States Prepare A Bailout to Assist Arafat," *The New York Times*, March 20, 2001.



## 1. Ties to Hamas and Indoctrination

In 1993, Hamas operative Moin Shubib, speaking at a Hamas meeting in Philadelphia, tied the *al Salah* society to Hamas and described the *al Salah* Society – along with others – as “our organizations.”<sup>400</sup> On August 7, 2007, *al Salah* Society was designated an SDGT by the U.S. Department of Treasury for its Hamas affiliation.<sup>401</sup> Hamas has utilized the *al Salah* Society to recruit and indoctrinate Palestinian youth.<sup>402</sup>

## 2. Shared Members

The *al Salah* Society was, for over a decade, directed by Ahmad Al-Kurd, who was designated a Specially Designated Global Terrorist on August 7, 2007.<sup>403</sup> Since 2006, al-Kurd has served as Minister of Work and Social Affairs in the Hamas-led government in Gaza. The U.S. Treasury Department stated, “Al-Kurd’s affiliation with Hamas goes back over a decade. During the First Intifada, Al-Kurd served as a Hamas Shura Council member in Gaza. As of late 2003, Al-Kurd was allegedly the top Hamas leader in Deir al-Balah, Gaza. Since mid-2005, he has served as the mayor of Deir Al-Balah, elected as a Hamas candidate.”<sup>404</sup>

The *al Salah* Society has also employed a large number of Hamas operatives. According to the U.S. Department of Treasury, “In late 2002, an official of the *Al-Salah* Society in Gaza was the principal leader of a Hamas military wing structure in the Al-Maghazi refugee camp in Gaza. The founder and former director of the *Al-Salah* Society's Al-Maghazi branch reportedly also operated as a member of the Hamas military wing. Al-Maghazi participated in weapons deals, and served as a liaison to the rest of the Hamas structure in Al-Maghazi. At least four other Hamas military wing members in the Al-Maghazi refugee camp in Gaza were tied to the *Al-Salah* Society.”<sup>405</sup>

## 3. Hamas-related Activities

On February 25, 2002, the Israeli government declared the *al Salah* Society an unlawful organization.<sup>406</sup> In August 2003, the *al Salah* Society was included on a list of Hamas- and PIJ-affiliated charities, whose bank accounts were frozen by the Palestinian Authority. After this action, the PA confirmed that the *al Salah* Society was indeed a front for Hamas.<sup>407</sup>

In a January 2000 letter made public in the HLF trial, Al-Kurd thanked HLF for its continued assistance in “...helping the children of the martyr and the orphans.”<sup>408</sup>

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<sup>400</sup> Transcript of Dr. Moin Shubib, Philadelphia meeting, *U.S. v. HLF et al.*, 3:04-CR-240-G, GX 016-0059.

<sup>401</sup> U.S. Department of Treasury, “Treasury Designates Al-Salah Society Key Support Node for Hamas,” August 7, 2007.

<sup>402</sup> *Id.*

<sup>403</sup> *Id.*

<sup>404</sup> *Id.*

<sup>405</sup> *Id.*

<sup>406</sup> CSS Special Information Bulletin, “List of Entities Declares ‘Unlawful Organizations’ In Israel by order of Israeli Prime Minister, according to Israeli Emergency Defense Regulations (article 82 2 A) 1945 Due to their Connection to Hamas,” available at [http://www.terrorism-info.org.il/malam\\_multimedia/html/final/eng/c\\_t/ipm\\_2\\_04.htm](http://www.terrorism-info.org.il/malam_multimedia/html/final/eng/c_t/ipm_2_04.htm).

<sup>407</sup> U.S. Department of Treasury, “Treasury Designates Al-Salah Society Key Support Node for Hamas,” August 7, 2007.

<sup>408</sup> Letter from Al-Kurd to HLF, January 19, 2000, *U.S. vs. HLF, et al.*, 3:04-CR-240-G, GX 001-0168.

In a letter dated November 28, 2002, the German Intelligence Service (BND) informed the German Ministry of the Interior in Berlin that it believed the *al Salah* Society (Al Salah Islamic Association) was part of Hamas. The German intelligence service reported that their expert opinion was based on information available to the BND, including some of its own information as well as material from other countries' intelligence services which the BND "subjected to review regarding its plausibility." According to the BND:

The association Jam'iyat al-Salah / Al-Salah Islamic Association in the center of the Gaza Strip is an Islamic social club to be directly linked to the HAMAS environment. The association's president, Ahmad AL-KURD, is a leading member of HAMAS. Two branches of the association, in Bethlehem and Ramallah, were banned by the Palestinian Authority based on allegations that it belonged to HAMAS. In the course of the al-Aqsa Intifada, the association is one of the important recipients of donated funds from the "Saudi Committee for the Support of the al-Aqsa Intifada" (al-Lajna al-sa'udiya li-da'm intifadat al-Quds) which are to be specifically passed on to families of Palestinian "Martyrs." Among the "martyrs" cited by name are also suicide bombers. Based on Saudi donation lists available to us it is known that in the winter of 2001/2002 each recipient "family of martyrs" received an amount of 20,000 riyal (approx. US \$5,300.00).<sup>409</sup>

Furthermore, as noted above, the *al-Salah* Society received funds from The Al-Aqsa Foundation,<sup>410</sup> CBSP and Interpal. Between 1997 and 2002, Crédit Lyonnais transferred the equivalent of over \$870, 000 on behalf of CBSP to *al-Salah*.<sup>411</sup> Between 1997 and 2005, Interpal transferred the equivalent of over \$4,000,000 to *al-Salah*.<sup>412</sup>

#### **D. Al-Wafa Charitable Society – Gaza**

According to its website, Al-Wafa Charitable Society was founded in 1980 to provide varied services for the elderly. The Charitable Society established the Al-Wafa Center for the Care of the Elderly, which provided medical care not only to the elderly, but also to the surrounding community generally. The medical center was the nucleus for the Al-Wafa Hospital in Gaza.<sup>413</sup> Moin Shubib noted the significance of Al-Wafa Charitable Society - Gaza in a 1993 meeting that was attended by several subsequently convicted Hamas fundraisers by including it in the "limited" number of organizations that were Hamas's institutions in the Gaza Strip.<sup>414</sup>

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<sup>409</sup> Letter dated November 28, 2002, from the German Intelligence Service (BND) to the German Ministry of the Interior in Berlin, Subject: Proscription Proceedings Al-Aqsa e. V Aachen, provided by Plaintiffs, marked page W\_S092791.

<sup>410</sup> For Al-Aqsa Foundation, see Letter dated November 28, 2002, from the German Intelligence Service (BND) to the German Ministry of the Interior in Berlin, Subject: Proscription Proceedings Al-Aqsa e. V Aachen, provided by Plaintiffs, marked pages W\_S092791-W\_S092795.

<sup>411</sup> Expert Report of Wayne D. Geisser, CPA, CVA, CFE, Nihill & Riedley, PC, November 19, 2009.

<sup>412</sup> *Id.*

<sup>413</sup> El Wafa Charitable Society website (Arabic), "About the Society," available at <http://www.elwafa.ps/view1.php?id=2>.

<sup>414</sup> Transcript of Dr. Moin Shubib, Philadelphia meeting, U.S. v. HLF et al., 3:04-CR-240-G, GX 016-0059.



depicting two suicide bombers who executed bombings in Mahoula and Netanya, and who earlier had gone to a high school sponsored by the Nablus Zakat Committee.<sup>509</sup>

It additionally runs a group that promotes memorization of the Quran and was established in 1987.<sup>510</sup> This group is headed by Yaish, the committee's treasurer, and houses a shooting range, arrows, and plastic guns.<sup>511</sup> Found at the Quran center was a video of a children's graduation ceremony at which Beitawi spoke and lashed out at "the Jews, the Crusaders" and the "heretics," a video of the Izz al-Din al-Qassam Brigades, postcards of Hamas suicide bombers, and teaching aides showing pictures of bombings and wounded Israelis.<sup>512</sup> The committee also was in possession of a video tape depicting an armed individual reciting a speech about a planned kidnapping of someone in an Israeli Security Agency.<sup>513</sup>

#### **H. Islamic Solidarity (Al-Tadamon) Charitable Society – Nablus**

The al-Tadamon Charitable Society is a paradigmatic model of how Hamas operatives are positioned within the organization's social welfare institutions. Founded by the Muslim Brotherhood in the 1950s, al-Tadamon operates in very close cooperation with two other Hamas charities in the area, the Nablus Zakat Committee and the Jenin Zakat Committee. Sheikh Hamid Bitawi,<sup>514</sup> a senior Hamas official, has served simultaneously as the head of the al-Tadamon Charitable Society and the vice chairman of the Nablus Zakat Committee, and the two charities' boards of directors have shared many members. In a sign of his radical Islamist worldview, Bitawi told a crowd of 10,000 Hamas supporters following a suicide bombing at a Tel Aviv café in March 1997, "I have good news. There is a suicide operation in Tel Aviv." He continued, "This is the only language the occupiers understand, the language of martyrdom."<sup>515</sup> Bitawi is also the chairman of the Palestinian Association of Islamic Scholars, which includes many Hamas members, and issued a religious edict (fatwa) praising suicide attacks as "actions [that] are an exalted expression of jihad for the sake of Allah and are not to be considered suicide."<sup>516</sup>

The Palestinian Authority closed al-Tadamon's main offices, its sports club, and its medical clinic in December 2001 because of al-Tadamon's role as a key Hamas front organization.<sup>517</sup>

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<sup>509</sup> Nablus Zakat No. 2, cited in Testimony of Avi, Israeli Security Agency, U.S. v. HLF et al., vol. 27, October 29, 2008.

<sup>510</sup> Testimony of Avi, Israeli Security Agency, U.S. v. HLF et al., vol. 29, October 31, 2008.

<sup>511</sup> *Id.*

<sup>512</sup> *Id.*

<sup>513</sup> Nablus No. 6, cited in Testimony of Avi, Israeli Security Agency, U.S. v. HLF et al., vol. 29, October 31, 2008.

<sup>514</sup> Bitawi's role as a Hamas leader is neatly encapsulated in an Australian documentary entitled "The Dirty War," which can be viewed at [http://www.youtube.com/watch?v=KKma5eW7\\_sw](http://www.youtube.com/watch?v=KKma5eW7_sw). In the film, Bitawi headlines a Hamas rally in Nablus in 2001.

C.S.S. Special Information Bulletin, Intelligence and Terrorism Information Center, "The Union of Good," February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

<sup>515</sup> "Suicide Bombing in Tel Aviv," Congressional Record Volume 143, Number 38, Government Printing Office, March 21, 1997, available at <http://www.gpo.gov/fdsys/pkg/CREC-1997-03-21/html/CREC-1997-03-21-pt1-PgH1286-3.htm>.

<sup>516</sup> C.S.S. Special Information Bulletin, Intelligence and Terrorism Information Center, "The Union of Good," Appendix A, February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/html/final/eng/sib/2\\_05/funds\\_a.htm](http://www.terrorism-info.org.il/malam_multimedia/html/final/eng/sib/2_05/funds_a.htm).

<sup>517</sup> Letter dated November 28, 2002, from the German Intelligence Service (BND) to the German Ministry of the Interior in Berlin, Subject: Proscription Proceedings Al-Aqsa e. V Aachen, provided by Plaintiffs, marked page W\_S092791 – W\_S092795.

The Society's close ties to Hamas are corroborated not only by Muin Shubib's statement to Hamas members in the United States<sup>518</sup> but by other sources as well. For example, an Israeli analysis of al-Tadamon's board of directors revealed that all the members were Hamas activists.<sup>519</sup> Dr. Abd al-Rahim Radi al-Hanbali<sup>520</sup>, chairman of the Nablus Zakat Committee and a member of the al-Tadamon board, is described by Israel as "a senior political Hamas activist" whose son, Mohammad al-Hanbali, was "one of the heads of Hamas' terrorist-operational infrastructure in Nablus."<sup>521</sup> Another board member, Haj Adli Rafat Salih Yaish, was deported to Lebanon along with other Hamas officials in 1992, and was very involved in Hamas money transfers as treasurer of the Nablus Zakat Committee.<sup>522</sup> Dr. Muawiyah Rizq al-Masri was a prominent advocate for supporting families of martyrs and "at the end of 2002 he waged a public struggle for the continuation of payments to such families."<sup>523</sup> Members of the al-Tadamon board are involved with related Hamas institutions too, including the al-Tadamon medical clinic, the al-Ansar sports club and the Koran Memorization Committee.<sup>524</sup> Israeli forces killed a former board member – Sheikh Jamal Damouni – in a July 31, 2001, missile strike targeting the Palestinian Center for Studies and Media (a Hamas center run by Jamal Mansour, a senior Hamas leader also killed in the attack).<sup>525</sup>

Sheikh Hamid Bitawi<sup>526</sup> is himself a telling example of the kind of Hamas leadership embedded within the organization's *da'wa* infrastructure. The head of the Association of Religious Clerics in Palestine<sup>527</sup> (also known as the Council of Sages of Religion of Palestine, the Palestinian Islamic Scholars Association, or the Palestine Association of Religious Scholars), Bitawi enjoys a position of religious prestige and legal authority in the Palestinian Territories independent from that earned as the head of the al-Tadoman Charitable Society.<sup>528</sup> The Association of Religious Clerics was established by prominent Hamas religious figures who saw the need for an organization that would issue religious edicts in support of Hamas's actions,

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518 Transcript of Dr. Moin Shubib, Philadelphia meeting, U.S. v. HLF et al., 3:04-CR-240-G, GX 016-0059.

519 C.S.S. Special Information Bulletin, Intelligence and Terrorism Information Center, "The Union of Good," February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

520 Hanbali was listed as an unindicted co-conspirator in the U.S. v. Holy Land Foundation criminal case as an "individual who [is] and/or [was] part of the HAMAS' social infrastructure in Israel and the Palestinian territories," see U.S. v. HLF et al., CR 3:04-CR-240-G, List of Unindicted Co-Conspirators and/or Joint Venturers.

521 C.S.S. Special Information Bulletin, "The Union of Good," Intelligence and Terrorism Information Center, February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

522 *Id.*

523 *Id.*

524 *Id.*

525 *Id.*

526 Bitawi was also listed as an unindicted co-conspirator in the U.S. v. Holy Land Foundation criminal case as an "individual who [is] and/or [was] part of the HAMAS' social infrastructure in Israel and the Palestinian territories," see U.S. v. HLF et al., CR 3:04-CR-240-G, List of Unindicted Co-Conspirators and/or Joint Venturers.

527 Cal Thomas, "Many Problems to Correct," The Washington Times, September 21, 2001; CSS Special Information Bulletin, "Profile of the Hamas Movement," February 12, 2006, available at [http://www.terrorism-info.org.il/malam\\_multimedia/English/eng\\_n/pdf/hamas\\_e0206.pdf](http://www.terrorism-info.org.il/malam_multimedia/English/eng_n/pdf/hamas_e0206.pdf).

528 C.S.S. Special Information Bulletin, Intelligence and Terrorism Information Center, "The Union of Good," February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

thereby promoting Hamas's ideology of militancy and violence against Israel.<sup>529</sup> Several members of the association are also affiliated with al-Najah University, a Hamas stronghold in Nablus.<sup>530</sup> Several other members are officials of Hamas charities, including Ghassan Harbas, the chairman of the Orphan Care Society in Bethlehem.<sup>531</sup> Bitawi is also a preacher at the famous al-Aqsa mosque in Jerusalem<sup>532</sup> and has held prominent judicial positions such as head of the appellate courts in Nablus.<sup>533</sup>

Bitawi's institutional authority gives currency to his radical ideas and broadens the Palestinian audience exposed to his message. On more than one occasion, he has voiced his support for jihad and martyrdom – even explaining in one interview why it is religiously permissible for children to take part in jihad and martyrdom missions.<sup>534</sup> In another interview, Bitawi referred to suicide bombers as “angels sent to us from heaven.”<sup>535</sup> He frequently employs purported religious textual interpretation and edicts to support militancy. In the wake of the death of Hamas bomb maker Mohi al-Din al-Sharif, Bitawi told a crowd of Hamas supporters that “religious rulings dictate that the Palestinian people must conduct acts of Jihad to rock the enemy. We call on the Islamic movement [Hamas] to take its revenge for its martyr.”<sup>536</sup> Similarly, at a rally following the Israeli assassination of Sheikh Ahmed Yassin, Bitawi criticized Palestinian officials who urged restraint and “peaceful Intifada,” saying, “We want to ask those officials in the Palestinian Authority who speak of a peaceful Intifada: will this Intifada liberate our homeland, oust the occupiers and free our detainees?”<sup>537</sup>

In a letter dated November 28, 2002, the German Intelligence Service (BND) informed the German Ministry of the Interior in Berlin that it believed the Al-Tadamun Charitable Society was part of Hamas. The German intelligence service reported that their expert opinion was based on information available to the BND, including some of its own information as well as material from other countries' intelligence services which the BND “subjected to review regarding its plausibility.” According to the BND:

The association Jam'iyat al-Tadamun / Al-Tadamun Charitable Society is directly linked to the HAMAS sphere of influence. In the winter of 2001/2002, the association was banned by the Palestinian Authority based on charges of

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<sup>529</sup> C.S.S. Special Information Bulletin, “‘Charity’ and Palestinian Terrorism: Spotlight on the Hamas-Run Islamic al-Tadhamun ‘Charitable Society’ in Nablus,” February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/MAR29\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/MAR29_05.PDF).

<sup>530</sup> CSS Special Information Bulletin, “‘Charity’ and Palestinian Terrorism: Spotlight on the Hamas-Run Islamic al-Tadhamun ‘Charitable Society’ in Nablus,” February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/MAR29\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/MAR29_05.PDF).

<sup>531</sup> CSS Special Information Bulletin, “Spotlight on a Hamas Da’wah Institution in the West Bank,” Bethlehem Orphan Care Society, January 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/JAN22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/JAN22_05.PDF).

<sup>532</sup> “Preacher of Al-Aqsa Mosque Urges Arab Armies, Volunteers to Fight Israel,” BBC Monitoring Middle East, August 22, 2001.

<sup>533</sup> Elaine Shannon, “How will Hamas Rule?” *Time Magazine*, February 19, 2005, available at <http://www.time.com/time/magazine/article/0,9171,1161255,00.html>.

<sup>534</sup> Itamar Marcus, “Ask for Death! The Indoctrination of Palestinian Children to Seek Death for Allah- Shahada,” available at <http://www.pmw.org.il/ask%20for%20death.htm>.

<sup>535</sup> William B. Helmreich, “No Sense Negotiating with Terrorists,” *Newsday*, June 30, 2004, A40.

<sup>536</sup> Agence France Presse, “Thousands of Demonstrators Urge Bomb Attacks Against Israel,” April 3, 1998

<sup>537</sup> Islam Online, “‘Sad Friday’ Rallies Against Yassin Assassination,” [www.islamonline.net/English/News/2004-03/26/article06.shtml](http://www.islamonline.net/English/News/2004-03/26/article06.shtml).

affiliation with HAMAS. The association's leadership includes several persons who were deported as HAMAS activists to South Lebanon (Marj al-Zuhur) and who were among the leading HAMAS members, for example Munir AQD, Nabil BISHAWI, Kamal Abu AISHA, Abd Nassir QADAH, Adli YA'ISH, Salah al-Din MUSLAH and Hamza JABIR.<sup>538</sup>

## **I. Ramallah - Al-Bireh Zakat Committee**

The Charity and Contribution Committee of Ramallah-al-Bireh and the Surrounding Area (*Lajnat al-Zakat wal-Sadaqaat Ramallah wal-Bireh wal-Liwaa*), more commonly known as the Ramallah-al-Bireh zakat committee, was established in 1978 and is run by Hamas.<sup>539</sup> The Ramallah-al-Bireh zakat committee was designated by Israel as an Unlawful Association in 2002.<sup>540</sup> In a 1991 a letter from Hamas associates in the territories to Hamas fundraisers in the United States, the Ramallah zakat committee's relationship to Hamas is described as, "all of it is ours."<sup>541</sup>

### **1. Shared Leadership**

The committee is headed by Dr. Abd al-Qadir Abu Awad, a respected physician.<sup>542</sup> Omar Hamdan, a senior Hamas member, was a member of the Ramallah Zakat Committee since at least 1989 until around 2000, at which time he moved to the Ramallah al-Islah Zakat Committee, which had split away from Ramallah-al-Bireh Zakat in 1997.<sup>543</sup> Most of its members are Hamas activists.

While the Ramallah-al-Bireh Zakat Committee was ostensibly headed by respectable figures, another Palestinian intelligence report listed its active members (including the charity's administrative director and accountant) and concluded that "all the aforementioned are considered Hamas activists and we have files on them."<sup>544</sup> After listing some of the charity's investments and programs, the report noted, "The committee is run by Hamas in a sophisticated manner. Its main activity is transferring funds from the 'outside' [funds raised abroad] into Hamas's coffers [in the West Bank]."<sup>545</sup>

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<sup>538</sup> Letter dated November 28, 2002, from the German Intelligence Service (BND) to the German Ministry of the Interior in Berlin, Subject: Proscription Proceedings Al-Aqsa e. V Aachen, provided by Plaintiffs, marked page W\_S092791 – W\_S092795.

<sup>539</sup> "Ramallah al-Bireh Zakat," <http://web.archive.org/web/20080312175815/www.zakatramallah.org/pages/whowas.html>.

<sup>540</sup> C.S.S. Special Information Bulletin, "List of Entities Declared 'Unlawful Organizations' In Israel by order of Israeli Prime Minister, according to Israeli Emergency Defense Regulations (article 82 2 A) 1945 Due to their Connection to Hamas," available at [http://www.terrorism-info.org.il/malam\\_multimedia/html/final/eng/c\\_t/ipm\\_2\\_04.htm](http://www.terrorism-info.org.il/malam_multimedia/html/final/eng/c_t/ipm_2_04.htm).

<sup>541</sup> Elbarasse Search No. 22 (See U.S. v. HLF et al., 3:04-CR-240-G) cited in Testimony of Lara Burns, U.S. v. HLF et al., vol. 25, October 27, 2008.

<sup>542</sup> C.S.S. Special Information Bulletin, Interpal, Part II, "Appendix A(2): The Ramallah-al-Bireh Charity and Contribution Committee," available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15\\_04.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15_04.PDF).

<sup>543</sup> Testimony of Avi, Israeli Security Agency, U.S. v. HLF et al., vol. 27, October 29, 2008

<sup>544</sup> C.S.S. Special Information Bulletin, Interpal, Part II, "Appendix A(2): The Ramallah-al-Bireh Charity and Contribution Committee," available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15\\_04.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15_04.PDF).

<sup>545</sup> C.S.S. Special Information Bulletin, Interpal, Part II, "Appendix A(2): The Ramallah-al-Bireh Charity and Contribution Committee," available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15\\_04.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15_04.PDF); The activists listed in another Palestinian intelligence report were Husni Mohammad Abd al-Qadi Abu Awad (chairman); Darwish al-Zaban (al Zien);

Good in Saudi Arabia (both Hamas-affiliated charities), designated a monthly sum of over \$18,000 for one such rent project in 2003.<sup>594</sup>

The Jenin Zakat Committee has used educational institutions, such as schools and Koran memorization centers, to radicalize operatives and coordinate attacks. Jamal Abd al-Shamal Abu Hija, a senior terrorist operative in the Jenin area, simultaneously served as a supervisor for a Koran memorization center and a member of the Jenin Zakat Committee. Abu Hija “was in charge of groups responsible for sending terrorists into Israel to perpetrate suicide bombing attacks.”<sup>595</sup> The Union of Good requested that the Jenin Zakat Committee formulate proposals for radicalizing summer youth camps.<sup>596</sup> Hamas has successfully used such camps to recruit and train new members. For example, as noted previously, in July 2003, a Gaza-based Hamas summer camp called “The al-Aqsa Intifada Martyrs Summer Camp” focused on the radicalization and indoctrination of Palestinian youth.<sup>597</sup>

### 3. International Links

The Jenin Zakat Committee has also been linked to HLF, which provided it with over \$655,000 between May 1991 and December 2001.<sup>598</sup> Furthermore, Abd al-Rahim Nasrallah, a Hamas activist in Saudi Arabia, is reported to have been in direct contact with Zayd Mahmud Abd al-Rahim Salameh Zakarneh, the head of the Jenin Zakat Committee.<sup>599</sup> Both Zakarneh in Jenin and Nasrallah in Saudi Arabia arranged for the transfer of hundreds of thousands of dollars to Hamas through the Jenin Zakat Committee.<sup>600</sup>

### M. Al-Islah Charitable Society - Ramallah & Al-Bireh

The Al-Islah Charitable Association is a multi-branch charitable organization controlled by Hamas. Its Ramallah branch was founded by Hamas military commander Jamal Tawil. Tawil readily acknowledged founding the Al-Islah charity as a purportedly legitimate front through whose accounts he could launder the monthly fund transfers he received from Hamas.<sup>601</sup>

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<sup>594</sup> C.S.S. Special Information Bulletin, “The Union of Good,” available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

<sup>595</sup> *Id.*

<sup>596</sup> C.S.S. Special Information Bulletin, “The Union of Good,” Appendix B(6), available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

<sup>597</sup> MFA, “The Exploitation of Children for Terrorist Purposes.” MFA Library, January, 2003, [http://www.mfa.gov.il/MFA/MFAArchive/2000\\_2009/2003/1/The+Exploitation+of+Children+for+Terrorist+Purpose.htm](http://www.mfa.gov.il/MFA/MFAArchive/2000_2009/2003/1/The+Exploitation+of+Children+for+Terrorist+Purpose.htm).

<sup>598</sup> Jenin Zakat Committee Grant Report, *US v. HLF et al.*, GX 020-0005, 3:04-CR-240-G.

<sup>599</sup> “The Union of Good,” Special Information Bulletin, Intelligence and Terrorism Information Center at the Center for Special Studies, Israel, February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

<sup>600</sup> “The Union of Good,” Special Information Bulletin, Intelligence and Terrorism Information Center at the Center for Special Studies, Israel, February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF) ; *See also* Matthew Levitt, “A Hamas

Headquarters in Saudi Arabia?” PolicyWatch 3521, The Washington Institute for Near East Policy.

<sup>601</sup> Typologies And Open Source Reporting On Terrorist Abuse Of Charitable Operations In Post-Earthquake Pakistan And India, U.S. Department of the Treasury, available at [http://www.treas.gov/offices/enforcement/key-issues/protecting/docs/charities\\_post-earthquake.pdf](http://www.treas.gov/offices/enforcement/key-issues/protecting/docs/charities_post-earthquake.pdf) (p. 3).



## 1. Shared Leadership

Dr. Issa Thawabtah was head of the Al-Islah Charitable Association until February 2001, when he left the association to become director of the Beit Fajar Zakat Committee. Sheikh Anwar Zaboun, a Hamas activist from Beit Sahour, became Al-Islah Charitable Association's new leader.<sup>602</sup> The Union of Good conducts its activities in the central West Bank through the Al-Islah Charitable Association in Ramallah.<sup>603</sup>

## 2. Hamas-Related Activities

According to the Israeli government, the Al-Islah Charitable Association distributes money to the families of suicide bombers and prisoners in Palestinian and Israeli jails.<sup>604</sup> An analysis of Israeli intelligence figures reflects that during the three days of the Muslim holiday Eid al-Fitr in 2001, 46% (approximately \$42,295) of the Al-Islah Charitable Association's disbursements were directed to supporting terrorists and their families, compared to 43% (\$39,537) for social welfare institutions. Extrapolating this data over a one-year period suggests that the Al-Islah Charitable Association's annual expenses would amount to \$508,265 for the support of terrorists and their families, and \$474,450 for Hamas social welfare institutions.<sup>605</sup> Al-Islah was also intimately related to the Union of Good, as a 2001 letter from the Union of Good to the committee attests. The letter asks the committee to prepare a report and media survey regarding aid to Palestinian families and support of the Palestinian consumer and lists as benefactors, *inter alia*, Interpal and many branches of Al-Aqsa, including Al-Aqsa Germany.<sup>606</sup>

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<sup>602</sup> Palestinian National Authority Document No. 1, February 22, 2001, in C.S.S. Special Information Bulletin, Spotlight on a Hamas Dawah Institution in the West Bank, January, 2005. Available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/JAN22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/JAN22_05.PDF).

<sup>603</sup> "The Union of Good," Special Information Bulletin, Intelligence and Terrorism Information Center at the Center for Special Studies, Israel, February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/html/final/eng/sib/2\\_05/funds.htm](http://www.terrorism-info.org.il/malam_multimedia/html/final/eng/sib/2_05/funds.htm). See also Intelligence and Terrorism Information Center at the Center for Special Studies (C.S.S.), "List of Entities Declares 'Unlawful Organizations' In Israel by order of Israeli Prime Minister, according to Israeli Emergency Defense Regulations (article 82 2 A) 1945 Due to their Connection to Hamas," available at [http://www.terrorism-info.org.il/malam\\_multimedia/html/final/eng/c\\_t/ipm\\_2\\_04.htm](http://www.terrorism-info.org.il/malam_multimedia/html/final/eng/c_t/ipm_2_04.htm).

<sup>604</sup> C.S.S. Special Information Bulletin, Interpal Part I, December 2004, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC12A\\_04.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC12A_04.PDF); C.S.S. "The Union of Good," Special Information Bulletin, Intelligence and Terrorism Information Center, February 2005, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/FEB22_05.PDF).

<sup>605</sup> C.S.S. Special Information Bulletin, Interpal, Part I, "Appendix B: Interpal Transfer of Contributions to the Designated Hamas-Affiliated Al-Islah Charitable Society, Both the Ramallah-Al-Bireh and Bethlehem Branches—Another Test Case Examining Interpal's Connections with One of Hamas' Leading Institutions in the PA-Administered Territories," December 2004, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15\\_04.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15_04.PDF); see also C.S.S. Special Information Bulletin, Interpal Part III, December 2004, [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/JAN17\\_05.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/JAN17_05.PDF). Data received in New Israeli Shekels (NIS) and converted into American dollars using the exchange rate of 4.08 NIS=1 US\$; for conversion rate, see Central Intelligence Agency, "Exchange Rates," World Factbook, [http://www.umsl.edu/services/govdocs/wofact2001/fields/exchange\\_rates.html](http://www.umsl.edu/services/govdocs/wofact2001/fields/exchange_rates.html).

<sup>606</sup> Comité de Bienfaisance et de Secours aux Palestiniens (CBSP): A French Hamas-Affiliated Fund Which Provides Financial Support for Hamas Institutions in the PA-Administered Territories, "Part A: Background Information About Hamas's Terrorism-Funding Apparatus and its Civilian Infrastructure (da'wah)," Appendix C(1), March 2005, [http://www.terrorism-info.org.il/malam\\_multimedia/html/final/eng/sib/4\\_05/cbsp\\_e4.htm](http://www.terrorism-info.org.il/malam_multimedia/html/final/eng/sib/4_05/cbsp_e4.htm).

Jamal Tawil served as head of a Hamas prisoners committee responsible for supporting the families of Hamas prisoners and providing petty cash to the prisoners themselves. According to the indictment handed down against him by the Israeli government, Tawil sent Hamas inmates instructions to have bank accounts opened for them into which Hamas could deposit funds. Following several failed attempts to get a license from the PA for his prisoners committee, and on the recommendation of other Hamas political leaders, Tawil founded a branch of the Al-Islah Charitable Association in Ramallah “to camouflage the activities of the prisoners committee and to enable it to expand and receive donations from Islamic charitable societies abroad.”<sup>607</sup>

The Al-Islah Charitable Association also emphasizes indoctrination activities. A letter written by the charity to the Union of Good expressing gratitude for the support it provided to Hamas summer camps was found in the Al-Islah Charitable Association in February 2003. The Al-Islah Charitable Association report for the year 2000 included a picture of two Hamas activists holding a sign thanking Interpal.<sup>608</sup>

In August 2008 in Jericho, Fatah security forces arrested several Hamas-affiliated members of Al-Islah Charitable Association following a raid and confiscation of its property. Those arrested included leaders Abu Nael Riziq, Dr. Amer Jawabra, and Mohammed Totah.<sup>609</sup>

### 3. International Links

Israeli authorities arrested Jamal Tawil in 2002. During his post-arrest interrogation he revealed that he had received funds from Hamas political leaders in Syria and Lebanon on a monthly basis through the Al-Islah Charitable Association. In the course of the interrogation, Tawil stated that beginning in March 1998, Abu Ahmad (believed to be Ismael Srour, head of Hamas’s propaganda bureau in Lebanon) sent him monthly bank transfers of \$12,000 for Hamas-related activities – first into his personal account and later into the Al-Islah Charitable Association account, the Hamas-related charity that Tawil ran.<sup>610</sup> Tawil used the charity to launder funds for the al-Qassam Brigades suicide bombings he helped plan, including the attack in Jerusalem’s Ben-Yehuda pedestrian mall in December 2001 that killed 11 people and wounded 180.<sup>611</sup>

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<sup>607</sup> Indictment of Jamal Tawil, file #3559/02, November 9, 2003, cited in “Interpal, Part II,” Special Information Bulletin, Intelligence and Terrorism Information Center at the Center for Special Studies, Israel, December 2004, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15\\_04.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15_04.PDF).

<sup>608</sup> C.S.S. Special Information Bulletin, The Union of Good, “Appendix D: The Transfer of Funds from the Union of Good to the Hamas-Affiliated Ramallah al-Bireh al-Islah Charitable Society,” February, 2005. Available at [http://www.terrorism-info.org.il/malam\\_multimedia/html/final/eng/sib/2\\_05/funds\\_d.htm](http://www.terrorism-info.org.il/malam_multimedia/html/final/eng/sib/2_05/funds_d.htm).

<sup>609</sup> “Hamas: Fateh Forces Arrested 23 Hamas Supporters in the West Bank,” International Middle East Media Center, August 21, 2008, available at [http://www.imemc.org/index.php?obj\\_id=53&story\\_id=56644](http://www.imemc.org/index.php?obj_id=53&story_id=56644).

<sup>610</sup> Indictment of Jamal Tawil, file #3559/02, November 9, 2003, cited in “Interpal, Part II,” Special Information Bulletin, Intelligence and Terrorism Information Center at the Center for Special Studies, Israel, December 2004, available at [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15\\_04.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/MARKETING%20TERRORISM/PDF/DEC15_04.PDF).

<sup>611</sup> Israeli Security Forces Seize Palestinian Terrorist Assets Held in Banks Across the West Bank, February 25, 2004, Intelligence and Terrorism Information Center at the Center for Special Studies, Israel, [http://www.terrorism-info.org.il/malam\\_multimedia/ENGLISH/AUTHORITY-HAMAS/PDF/APR5\\_04.PDF](http://www.terrorism-info.org.il/malam_multimedia/ENGLISH/AUTHORITY-HAMAS/PDF/APR5_04.PDF).